

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW HAMPSHIRE

AMBER DOOLEN
20 Wolf Road
Lebanon NH 03766,

Plaintiff,

v.

BEST BUY STORES, LP d/b/a BEST BUY
7601 Penn Avenue South
Richfield MN 55423,

Defendant.

Civil Action No. _____

Removed from the Grafton County
Superior Court,
Case No. 215-2012-CV-00348

NOTICE OF REMOVAL

Pursuant to 28 U.S.C. §§ 1446, defendant Best Buy Stores, LP (“Best Buy”) hereby notices the removal to this Court of the civil action styled as Amber Doolen v. Best Buy Stores, LP d/b/a Best Buy from the Grafton County Superior Court, Case No. 215-2012-CV-00348. In support hereof, Defendant states the following:

1. Plaintiff Amber Doolen (“Plaintiff” or “Doolen”) served process on the Defendant on September 11, 2012.
2. True and correct copies of the summons and Writ served on Defendant are attached hereto as Exhibit 1. The documents at Exhibit 1 constitute all process, pleadings, and orders served on Defendant in this action.
3. In accordance with the requirements of 28 U.S.C. § 1446(b), this notice of removal is filed within thirty (30) days after Plaintiff served Defendant with a copy of the initial pleading setting forth the claims for relief upon which Plaintiff’s action is based. See Murphy Brothers, Inc. v. Michetti Pipe Stringing, Inc., 526 U.S. 344, 354-55 (1999).

4. Plaintiff asserts claims for gender and disability discrimination pursuant to NHRSA 354-A, and she appears also to assert claims under Title VII of the Civil Rights Act of 1964, 42 U.S.C. § 2002 *et seq.* (“Title VII”), as she references that statute and seeks remedies pursuant to it. See Writ, ¶¶ 18, 22. This Court therefore has jurisdiction over this case pursuant to 28 U.S.C. § 1331 because it presents a federal question pursuant to Title VII. See id.

5. As a result, this case is properly removable to this Court under 28 U.S.C. § 1441.

6. Pursuant to 28 U.S.C. § 1446(d), Defendant will promptly file a copy of this notice of removal with the Clerk of the Grafton County Superior Court and will also serve a copy upon Plaintiff’s attorney. A copy of said Notice is attached as Exhibit 2.

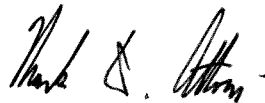
7. Pursuant to Local Rule 81.1, Defendant shall file a certified copy of the state court record with this Court within fourteen (14) days of this Notice.

WHEREFORE, Defendant Best Buy Stores, LP removes the action now pending against it in the Grafton County Superior Court, Case No. 215-2012-CV-00348, to this Court.

Respectfully submitted,

BEST BUY STORES, LP

By its attorneys,



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Dated: October 11, 2012

CERTIFICATE OF SERVICE

I hereby certify that on this date a true and correct copy of the foregoing was served by United States mail, first class postage prepaid, upon Linda Sullivan Leahy, Leahy & Leahy PLLC, 347 Village Street, Suite C, Penacook, NH 03303, attorney for Plaintiff.

A handwritten signature in black ink, appearing to read "Mark D. Attorri", is written above a horizontal line.

Mark D. Attorri